

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**APPLE INC.,**

**Plaintiff,**

**vs.**

**ERICSSON INC. AND  
TELEFONAKTIEBOLAGET LM ERICSSON,**

**Defendants.**

**Civil Action No. 2:21-cv-00460-JRG**

**JURY TRIAL DEMANDED**

**ERICSSON'S NOTICE OF COMPLIANCE WITH P.R. 4-1**

Pursuant to this Court's Order (Dkt. No. 89) and Patent Rule 4-1, Defendants and Counterclaim Plaintiffs Telefonaktiebolaget LM Ericsson and Ericsson Inc. (collectively, "Ericsson") respectfully notify the Court that on September 28, 2022, Ericsson served its Proposed Claim Terms for Construction on counsel for Plaintiff Apple Inc. via electronic mail.

Dated: September 30, 2022

Theodore Stevenson, III (Lead Attorney)  
Texas State Bar No. 19196650  
ted.stevenson@alston.com  
**ALSTON & BIRD LLP**  
2200 Ross Avenue, Suite 2300  
Dallas, TX 75201  
Telephone: (214) 922-3507  
Facsimile: (214) 922-3899

Ross R. Barton  
North Carolina State Bar No. 37179  
ross.barton@alston.com  
**ALSTON & BIRD LLP**  
101 S. Tryon St., Suite 4000  
Charlotte, North Carolina 28280  
Telephone: (704) 444-1000  
Facsimile: (704) 444-1111

Bryan Lutz (*pro hac vice*)  
Georgia Bar No. 915395  
bryan.lutz@alston.com  
**ALSTON & BIRD LLP**  
1201 West Peachtree Street  
Atlanta, GA 30309-3424  
Telephone: 404-881-7000  
Facsimile: 404-881-7777

Christine Woodin  
Texas State Bar 24199951  
cwoodin@hueston.com  
**HUESTON HENNIGAN LLP**  
523 West 6th St., Suite 400  
Los Angeles, CA 90014  
Telephone: (213) 788-4099  
Facsimile: (888) 775-0898

Respectfully Submitted,

/s/ Ross R. Barton  
Nicholas Mathews  
Texas State Bar No. 24085457  
nmathews@McKoolSmith.com  
Alexander Chern  
Texas State Bar No. 24109718  
achern@mckoolsmith.com  
**McKOOL SMITH, P.C.**  
300 Crescent Court Suite 1500  
Dallas, TX 75201  
Telephone: (214) 978-4000  
Facsimile: (214) 978-4044

Blake Bailey  
Texas State Bar No. 24069329  
bbailey@mckoolsmith.com  
**McKOOL SMITH, P.C.**  
600 Travis Street, Suite 7000  
Houston, TX 77002  
Telephone: (713) 485-7300  
Telecopier: (713) 485-7344

John Holley  
Texas State Bar No. 24078678  
jholley@McKoolSmith.com  
**McKOOL SMITH, P.C.**  
1999 K Street, NW Suite 600  
Washington, DC 20006  
Telephone: (202) 370-8300  
Facsimile: (202) 370-8344

Samuel F. Baxter  
Texas State Bar No. 01938000  
sbaxter@mckoolsmith.com  
**McKOOL SMITH, P.C.**  
104 E. Houston Street, Suite 300  
Marshall, TX 75670  
Telephone: (903) 923-9000  
Telecopier: (903) 923-9099

**ATTORNEYS FOR DEFENDANTS  
AND COUNTERCLAIM  
PLAINTIFFS ERICSSON INC. AND  
TELEFONAKTIEBOLAGET LM  
ERICSSON**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via electronic mail on September 30, 2022

/s/ Ross R. Barton  
Ross R. Barton